

# Uniform Network Code (UNC) 0918: ‘Reintroduction of the enhanced pressure service and increased MNEPOR for BBLC’ (UNC0918)

<b>Decision:</b>	The Authority <sup>1</sup> directs this modification to be made <sup>2</sup>
<b>Target audience:</b>	UNC Panel, Parties to the UNC and other interested parties
<b>Date of publication:</b>	7 May 2026
<b>Implementation date:</b>	To be confirmed by code administrator

## Background

Two bi-directional Gas Interconnectors connect the National Transmission System (‘NTS’) in Great Britain (‘GB’) to mainland Europe. The Balgzand to Bacton Line (‘BBL’) connects GB to the Netherlands and is operated by BBL Company (‘BBLC’). The Interconnector pipeline connects GB to Belgium and is operated by Interconnector Limited (‘INT’). Both Interconnectors connect to the NTS at the Bacton Interconnection Point (‘Bacton’). BBLC and INT are certified Transmission System Operators (‘TSOs’) and hold Gas Interconnector licenses.

Currently, National Gas (‘NG’, ‘the Proposer’) provides BBLC with an assured exit pressure of 45-55 bar at Bacton and a maximum NTS exit point offtake rate (‘MNEPOR’) of 184,780,632 kWh/d. This is set out in an Interconnector Agreement (‘IA’) between BBLC and NG.

<sup>1</sup> References to the “Authority”, “Ofgem”, “we” and “our” are used interchangeably in this document. The Authority refers to GEMA, the Gas and Electricity Markets Authority. The Office of Gas and Electricity Markets (Ofgem) supports GEMA in its day-to-day work. This decision is made by or on behalf of GEMA.

<sup>2</sup> This document is notice of the reasons for this decision as required by section 38A of the Gas Act 1986.

NG has previously raised several modifications proposing to allow temporary updates to the IA between NG and BBLC to increase the MNEPOR from 184,780,632 kWh/d (7,699,193kWh/h) to 252,000,000 kWh/d (10,500,000 kWh/h) and to give BBLC the option to request access to an Enhanced Pressure Service ('EPS') when exporting gas at Bacton. NG intended that these temporary solutions would allow it to gather data under real flow conditions, and that the data would help determine any link between EPS usage and dust mobilisation. Collecting such data has the potential to contribute towards identifying an enduring solution and to determine any increased risk of dust contamination.

The previously raised enabling modifications include the following:

- UNC0814<sup>3</sup> 'Temporary Access to the enhanced Pressure Service and Increase to the Maximum NTS Exit Point Oftake Rate of the BBL Interconnector' ('UNC0814'), raised by the Proposer on 22 July 2022 and approved by the Authority on 6 March 2023,
- UNC0859<sup>4</sup> 'Reintroduction of the enhanced pressure service and increased MNEPOR for BBLC (as introduced by UNC0814)' ('UNC0859'), raised by the Proposer on 9 October 2023 and approved by the Authority on 5 March 2024,
- UNC0891<sup>5</sup> 'Reintroduction of the enhanced pressure service and increased MNEPOR for BBLC (reintroduced by UNC0859 and introduced by UNC0814)' ('UNC0891'), raised by the Proposer on 6 August 2024 and approved by the Authority on 19 February 2025.

Following the implementation of UNC0814, UNC0859 and UNC0891 BBLC only accessed an EPS on nine gas days, due to prevailing market conditions. BBLC accessed the EPS twice in 2024 while UNC0859 was in effect and seven times in 2025 while UNC0891 was in effect.

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<sup>3</sup> For more information, see <https://www.gasgovernance.co.uk/0814>

<sup>4</sup> For more information, see <https://www.gasgovernance.co.uk/0859>

<sup>5</sup> For more information, see <https://www.gasgovernance.co.uk/0891>

BBLC's temporary access to the EPS expired on 31 December 2025 and its contractual arrangements subsequently reverted, meaning BBLC's maximum export capability is currently 184,780,632 kWh/d (7,699,193 kWh/h).

### **The modification proposal**

On 8 October 2025, NG raised UNC0918.<sup>6</sup> This fourth enabling modification proposes to allow a temporary update to the IA between NG and BBLC to introduce the same increase to the MNEPOR from 184,780,632 kWh/d (7,699,193kWh/h) to 252,000,000 kWh/d (10,500,000 kWh/h) and access to an EPS for a time limited period, as was approved by UNC0814, UNC0859 and UNC0891. The proposed changes, if approved, would be temporary and apply from the point a revised NG-BBLC IA and associated Pressure Service Charges Agreement ('PSCA') come into force up to and including 1 October 2026.

NG states that this temporary solution is necessary to allow it to gather operational data on BBLC accessing an EPS, which would then inform a future decision on the provision of an enduring EPS at Bacton to BBLC. NG states that following the implementation of UNC0859 and UNC0891, market conditions meant that BBLC only used the EPS on two gas days and on seven gas days respectively, and as a result NG and BBLC did not have the opportunity to collect sufficient data to assess any impact of use of the EPS by BBLC on the NTS. Given the limited number of EPS utilisation events and the absence of conclusive evidence linking EPS use to dust mobilisation a further period of data collection is required. Continued monitoring will help to clarify any potential relationships and inform the design of any enduring solution.

Throughout the period of engagement and consultation responses to the previous proposals of the EPS being in effect for BBLC, stakeholders have raised concerns about the increased risk of dust on the Interconnector pipeline as a result of BBLC accessing the EPS and the resultant increased velocities associated with the EPS. However, as stated in the Final

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<sup>6</sup> For more information, see <https://www.gasgovernance.co.uk/0918>

Modification Report ('FMR'), INT and BBLC are connected to different pipeline feeders within the Bacton Terminal. INT predominately receives gas from three distinct feeders, while BBLC export flows are almost exclusively facilitated by a separate feeder. This physical separation would make it unlikely for BBLC use of an EPS to have an impact on INT infrastructure.

### **UNC Panel<sup>7</sup> recommendation**

At the UNC Panel meeting on 15 January 2026, a majority of the UNC Panel considered that UNC0918 would better facilitate Relevant Objective ('RO') (d) and therefore recommended its approval.

### **Our decision**

We have considered the issues raised by UNC0918 and the FMR dated 15 January 2026. We have considered and taken into account the responses to the industry consultation on the modification proposal which are attached to the FMR.<sup>8</sup> As well as all previous information related to the three previous enabling modifications which remains relevant background for assessing the need for a further temporary EPS period to allow this service until 1 October 2026.

We have concluded that:

- implementation of the modification proposal will better facilitate the achievement of the relevant objectives of the UNC;<sup>9</sup> and

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<sup>7</sup> The UNC Panel is established and constituted from time to time pursuant to and in accordance with the UNC Modification Rules.

<sup>8</sup> UNC modification proposals, modification reports and representations can be viewed on the Joint Office of Gas Transporters website at [www.gasgovernance.co.uk](http://www.gasgovernance.co.uk)

<sup>9</sup> As set out in Standard Special Condition A11(1) of the Gas Transporters Licence, available at :

<https://www.ofgem.gov.uk/energy-policy-and-regulation/industry-licensing/licences-and-licence-conditions>

- directing that the modification be made is consistent with our principal objective and statutory duties.<sup>10</sup>

### Reasons for our decision

We consider this modification proposal will better facilitate UNC RO (d) and has a neutral impact on the other ROs.

In reaching our decision we have had regard to the Authority's previous approvals of UNC0814 (6 March 2023), UNC0859 (5 March 2024) and UNC0891 (19 February 2025), each of which temporarily enabled BBLC access to EPS and an increased MNEPOR. These decisions established the competition rationale (level-playing-field between Interconnectors) while relying on NG's operational discretion to manage integrity and security of supply risks.

#### ***(a) the efficient and economic operation of the pipe-line system to which this licence relates***

Both the Proposer and the Panel view this modification as having no impact on RO (a).

One consultation respondent identified the proposal as having a positive impact on RO (a), stating that the proposal would enable BBLC to increase the transportation capacity that it offers to its Shippers, increasing the provision of export capability available to the GB market and utilisation of the NTS. This respondent estimated that this would increase transportation revenue for NG, which in turn could result in lower costs for GB consumers.

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<sup>10</sup> The Authority's statutory duties are wider than matters which the Panel must take into consideration and are detailed mainly in the Gas Act 1986 as amended.

Similarly to the previous related modification proposals UNC0814, UNC0859 and UNC0891, one consultation respondent raised the issue around dust contaminants. INT stated in their consultation response that following incidents of contaminants being delivered from the NTS into their pipeline in 2022, 2023 and 2024 there had been further incidents of contaminants being delivered in May 2025.

We have carefully considered the issue of contaminants and, as noted in our previous decisions, if a situation were to arise where granting access to an EPS could jeopardise the safety of the NTS, we expect NG to act accordingly and curtail services as deemed necessary to safeguard all customers and the NTS.

This modification proposal is a contractual re-enablement of EPS access, with no change to UNC code text. NG retains full operational discretion to grant, limit or decline EPS having regard to system conditions. We have noted the evidence provided in the FMR, demonstrating that velocities remained well below IGEM thresholds during prior EPS use and that dust management is handled under business-as-usual ('BAU') arrangements.

Based on the above, we consider that this modification would have no impact on RO (a).

***(c) so far as is consistent with sub-paragraphs (a) and (b), the efficient discharge of the licensee's obligations under this licence***

Neither the Proposer nor the Panel identified RO (c) as being impacted by this modification.

One consultation respondent considered that this proposal would have a negative impact on RO (c), consistent with their responses to UNC0814, UNC0859 and UNC0891 consultations. The respondent expressed concerns about the impact of contaminated gas and noted that it would exacerbate the risk of disruption rather than further facilitating cross-border flows.

The Proposer has provided assurances that NG manages the issue of contaminants as a BAU operational matter. We note that NG's license obligations<sup>11</sup> to operate the NTS safely and efficiently are unaffected. EPS provisions remain at NG's discretion and may be withheld whenever operational information indicates a material risk.

Based on the above, we view this modification as having no impact on RO (c).

***(d) so far as is consistent with sub-paragraphs (a) to (c) the securing of effective competition:***

***(i) between relevant shippers;***

***(ii) between relevant suppliers; and/or***

***(iii) between DN operators (who have entered into transportation arrangements with other relevant gas transporters) and relevant shippers***

The Proposer is of the view that UNC0918 would have a positive impact on RO (d), which is consistent with the perspective they have offered when they raised UNC0814, UNC0859 and UNC0891.

They state that the implementation of this modification would enable greater levels of competition between Shippers and increase competition for capacity. Two consultation respondents expressed views of this proposal having a positive effect on RO (d). Both consultation respondents considered that the proposal would better facilitate cross-border competition between markets as well as increase the available export capacity, with one additionally noting that it has the potential to reduce commodity prices and benefit end consumers.

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<sup>11</sup> Standard Special Condition A17: General obligations in respect of gas transporters' pipe-line systems.

One consultation respondent viewed the proposal as having a negative effect on RO (d), stating that increased pressure and flows at Bacton could increase the risk of contaminants being delivered to Shippers using the Interconnector pipeline, consistent with their previous responses.

We consider that this modification proposal will better facilitate UNC RO (d).

We have carefully considered the responses and evidence provided by key stakeholders during the assessment of this modification proposal, as well as the responses and evidence presented for the previous related modification proposals UNC0814, UNC0859 and UNC0891. We deem that the risk of any dust contamination at Bacton is insufficient to outweigh the benefits of the proposal when mitigated by NG's BAU measures.

As we stated in our decisions on UNC0814, UNC0859 and UNC0891, giving BBLC access to the EPS would create a level playing field between BBLC and INT. This modification has the potential to increase competition between Shippers, who will have access to more capacity and flexibility, which can positively impact GB consumers through lower bills than would otherwise be the case.

***(e) so far as is consistent with sub-paragraphs (a) to (d), the provision of reasonable economic incentives for relevant suppliers to secure that the domestic customer supply security standards are satisfied as respects the availability of gas to their domestic customers***

The Proposer considered that the implementation of UNC0891 would have no impact on RO (e).

One consultation respondent viewed the proposal as having a positive impact on RO (e), stating that BBLC's capability to export gas to Europe would increase. The respondent stated

that this would enhance the ability of GB gas suppliers to access European gas storage facilities and increase the options for maintaining security of supply to GB consumers.

We are of the view that this modification would have no impact on RO (e).

This modification expands the available capacity at Bacton for the export of gas to continental Europe but does not entail an expansion in capacity into GB. As such, we consider that this modification relates to export pressure arrangements and does not change domestic supply security standards, capacity or incentives.

***(g) compliance with the Regulation and any relevant legally binding decisions of the European Commission and/or the Agency for the Co-operation of Energy Regulators***

The Proposer did not identify any impact on RO (g). One consultation respondent contended that this RO could be adversely affected due to an increased risk of contaminants entering the Interconnector pipeline, which could heighten the risk of disruption rather than support cross-border flows.

As set out above, the Proposer maintains that contaminant management is a BAU matter. NG noted that the use of an EPS by any party would be at its discretion and that operational information is considered when assessing requests to utilise the service. We note NG's assurances that it will continue to exercise its right to review and either accept or reject EPS requests submitted by BBLC or INT at Bacton. We also note NG's licence obligations in relation to operating an efficient and economic pipeline.

Having carefully considered the consultation responses and the issues raised we conclude that this Proposal has no impact on RO (g).

## **Our principal objective and statutory duties**

The Authority's principal objective is to protect the interests of existing and future consumers, which includes promoting effective competition and the security of supply of gas to them.

As was set out in our decision letters for UNC0814, UNC0859 and UNC0891, granting BBLC access to an EPS that INT have existing access to, will create a level playing field between both TSOs. This will ensure fair and equal treatment of both Interconnectors as well as facilitating a level playing field between them and their users, which will promote competition.

We consider that the modification does not materially increase the risk to security of supply, for the reasons explained in our assessment of RO (a).

For these reasons, we consider that approving UNC0918 until 1 October 2026 is consistent with our principal objective to protect the interest of GB consumers by promoting effective competition.

## **Data collection**

Following this decision, as we did after our decision on UNC0859 and UNC0891, we intend to contact NG to request that it report to Ofgem on requests made by BBLC and INT for an EPS, the use of the EPS, and on data collected regarding contaminants and velocities. We will also ask NG to report to us on how the information gathered informs their thinking towards an enduring solution.

## **Decision notice**

In accordance with Standard Special Condition A11 of the Gas Transporters licence, the Authority hereby directs that modification proposal UNC0918: *'Reintroduction of the enhanced pressure service and increased MNEPOR for BBLC (reintroduced by UNC0891 and UNC0859 and introduced by UNC0814)'* should be made.

**Hamsini Satchithanathan**

**Head of Gas Security and Flexibility**

Signed on behalf of the Authority and authorised for that purpose